

WILMER CUTLER PICKERING
HALE AND DORR LLP

SONAL N. MEHTA (SBN 222086)
Sonal.Mehta@wilmerhale.com
2600 El Camino Real, Suite 400
Palo Alto, California 94306
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)
David.Gringer@wilmerhale.com
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800

ARI HOLTZBLATT (*pro hac vice*)
Ari.Holtzblatt@wilmerhale.com
MOLLY M. JENNINGS (*pro hac vice*)
Molly.Jennings@wilmerhale.com
1875 Pennsylvania Ave NW
Washington, DC 20006
Telephone: (202) 663-6000

Attorneys for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation headquartered in California,

Defendant.

Case No. 3:20-cv-08570-JD

**DEFENDANT'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS MOTION TO
DISMISS FIRST AMENDED
CONSOLIDATED ADVERTISER CLASS
ACTION COMPLAINT**

Judge: Hon. James Donato

STANDING ORDER PARAGRAPH 31 NOTICE

The parties have agreed to use the approach outlined in Paragraph 31 of the Court's Standing Order for Civil Cases for the round of briefing associated with Defendant Meta Platforms, Inc.'s Motion to Dismiss the First Amended Consolidated Advertiser Class Action Complaint. Meta hereby notifies the Court that it will file a combined Administrative Motion to Seal briefing when its Motion to Dismiss is complete. That combined Administrative Motion to Seal will address all relevant documents submitted in connection with this briefing.

META PLATFORMS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL

Pursuant to Civil Local Rule 79-5(c) and Paragraph 31 of the Court's Standing Order for Civil Cases, Defendant Meta Platforms, Inc. files this Administrative Motion to Seal portions of Meta's Motion to Dismiss the First Amended Consolidated Advertiser Class Action Complaint ("FAC").

Meta's Administrative Motion to Seal asks the Court to consider whether to seal portions of Meta's Motion to Dismiss. As set forth below, Meta only seeks to seal a single sentence of its Motion to Dismiss that references non-public information contained in the FAC concerning the specific terms of contracts with business counterparties that Meta has designated as "Confidential" or "Highly Confidential" under the Stipulated Protective Order, Dkt. 111, and that, if revealed to Meta's competitors or potential counterparties, could cause competitive harm to Meta, *see* Khurana Decl. ¶¶ 7, 8, Dkt. 244-1. Accordingly, Meta requests that the Court enter an order sealing the information identified in the table below:

Document	Portions to be filed Under Seal	Party Claiming Confidentiality
Defendant's Motion to Dismiss First Amended Consolidated Advertiser Class Action Complaint	Highlighted portion of lines 8 and 9 at page 11.	Defendant

Included with this Motion is an unredacted version of Meta's Motion to Dismiss, highlighting the information that Meta requests remain under seal.

1 As noted, upon conclusion of briefing on Meta's Motion to Dismiss, the parties will submit
2 a combined Administration Motion to Seal addressing the excerpt identified above, as well as any
3 other portions of the Motion to Dismiss briefing that contain Meta's confidential information and
4 that Meta seeks to maintain under seal.

1 Dated: March 21, 2022

Respectfully submitted,

2 By: /s/ Sonal N. Mehta

3 SONAL N. MEHTA (SBN 222086)
4 Sonal.Mehta@wilmerhale.com
5 WILMER CUTLER PICKERING HALE
6 AND DORR LLP
7 2600 El Camino Real, Suite 400
8 Palo Alto, California 94306
9 Telephone: (650) 858-6000

10 DAVID Z. GRINGER (*pro hac vice*)
11 David.Gringer@wilmerhale.com
12 WILMER CUTLER PICKERING HALE
13 AND DORR LLP
14 7 World Trade Center
15 250 Greenwich Street
16 New York, New York 10007
17 Telephone: (212) 230-8800

18 ARI HOLTZBLATT (*pro hac vice*)
19 Ari.Holtzblatt@wilmerhale.com
20 MOLLY M. JENNINGS (*pro hac vice*)
21 Molly.Jennings@wilmerhale.com
22 WILMER CUTLER PICKERING HALE
23 AND DORR LLP
24 1875 Pennsylvania Ave NW
25 Washington, DC 20006
26 Telephone: (202) 663-6000

27 *Attorneys for Defendant Meta Platforms, Inc.*
28

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2022, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System.

By: /s/ Sonal N. Mehta
Sonal N. Mehta